

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE PERIODS FROM  
OCTOBER 14, 2021 THROUGH OCTOBER 31, 2021 AND  
JANUARY 1, 2022 THROUGH JANUARY 31, 2022**

Debtor: LTL Management LLC

Applicant: McCarter & English, LLP

Case No.: 21-30589-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: October 14, 2021 (the "Petition Date")

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**SECTION 1  
FEE SUMMARY**

☒ Interim Fee Application No. 3                      or                      ☐ Final Fee Application

Summary of Amounts Requested for the Periods from October 14, 2021 through October 31, 2021 and January 1, 2022 through January 31, 2022 (the "Third Statement Period").<sup>1</sup>

Total Fees Owed by LTL:	\$61,183.20
Total Disbursements Owed by LTL:	\$68.06
Total Fees Plus Disbursements:	\$61,251.26
Minus 20% Holdback of Fees:	\$12,236.64
Amount Sought at this Time:	\$49,014.62

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	<u>\$247,613.68</u>	<u>\$506.91</u>
Total Fees Allowed to Date:	<u>\$0</u>	<u>\$0</u>
Total Retainer (If Applicable):	<u>\$0</u>	<u>\$0</u>
Total Holdback (If Applicable):	<u>\$49,522.73</u>	<u>\$0</u>
Total Received by Applicant:	<u>\$95,676.03</u>	<u>\$19.81</u>

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<sup>1</sup> We have included fees incurred from Oct. 14, 2021 through Oct. 31, 2021 on this Third Fee Application, which were omitted from our Second Fee Application [Dkt. 1311] filed on 1/31/22.

<b>Name of Professional &amp; Title</b>	<b>Year Admitted</b>	<b>Hours</b>	<b>Rate (discounted from standard)</b>	<b>Fees</b>
Thomas W. Ladd, Esq., Partner	1986	38.2	\$688	\$26,281.60
Brett Kahn, Esq., Partner	2008	57.8	\$446	\$25,778.80
Jennifer Farina, Esq., Partner	2005	5.3	\$446	\$2,363.80
Geoffrey Lynott, Esq., Associate	2019	0	\$366	\$0
Andrew G. Heckler, Esq., Associate	2019	16.7	\$342	\$5,711.40
Ashley D. McWilliams, Esq., Associate	2019	61.4	\$303	\$18,604.20
Darren Smolarski, Esq., Associate	2019	126.2	\$342	\$43,160.40
Georgia Bender, Esq., Associate	2021	4.5	\$320	\$1,440.00
Deborah Brown, Paralegal		38.6	\$248	\$9,572.80
Michael Finkler, Lit/Sys Support		0	\$225	0
		348.7		\$132,913.00

## SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEES
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) Asset Disposition: Sales, leases, abandonment and related transaction work.		
c) Avoidance Action Litigation: Preference and fraudulent transfer litigation.		
d) Business Operations: Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) Case Administration: Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquires.		
f) Claims Administration and Objections: Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) Employee Benefits/Pensions: Review issues such as severance, retention, 401K coverage and continuance of pension plan.		
h) Fee/Employment Applications: Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	15.8	\$8,716.60
i) Fee/Employment Objections: Review of an objections to the employment and fee applications of others.		
j) Financing: Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) Litigation: Other than Avoidance Action Litigation (there should be a separate category established for each major matter).		
l) Meetings of Creditors: Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.		
m) Plan and Disclosure Statement: Formulation, presentation and confirmation; compliance with the plan confirmation order, related		

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEES</b>
orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.		
n) Relief from Stay Proceedings: Matters relating to termination or continuation of automatic stay under 362.		
o) Accounting/Auditing: Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) Business Analysis: Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		
q) Corporate Finance: Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) Data Analysis: Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) Litigation Consulting: Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	332.9	\$124,196.40
t) Reconstruction Accounting: Reconstructing books and records from past transactions and bringing accounting current.		
u) Tax Issues: Analysis of tax issues and preparation of state and federal tax returns.		
v) Valuation: Appraise or review appraisals of assets.		
w) Travel Time: Please note that non-working travel time must be billed at 50% of cost.		
<b>SERVICE TOTALS</b>	<b>348.7</b>	<b>\$132,913.00</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
Photocopies – 14 @ .07/page	\$0.98
Postage	\$57.72
Federal Express	\$77.42
<b>DISBURSEMENTS TOTALS</b>	<b>\$136.12</b>

**SECTION IV  
CASE HISTORY**

1. Date of Retention: December 16, 2021, effective as of the Petition Date [Dkt. 861] (the “Retention Order”).<sup>2</sup>

2. Summary explaining the nature of the work performed and the results achieved:<sup>3</sup>

During the Third Statement Period, McCarter & English professionals and paraprofessionals performed the following work on behalf of the Debtor:

- Assisted with preparations for hearings and preparation of motions and other documents, as related to insurance coverage issues, in connection with this chapter 11 bankruptcy case;
- Assisted with preparations for depositions and related discovery tasks in relation to insurance coverage issues;
- Analyzed insurance policies and related case materials with respect to insurance coverage issues arising in bankruptcy;
- Analyzed bankruptcy case materials with respect to issues impacting the New Jersey coverage litigation;
- Analyzed insurer document productions with respect to issues impacting insurance recovery;
- Communicated with other Debtor counsel as appropriate regarding various insurance coverage issues and related strategy; and
- Conducted legal research on discrete insurance coverage issues arising in bankruptcy and issues impacting New Jersey coverage litigation.

I certify under penalty of perjury that the above is true.

Date: February 25, 2022

/s/ Thomas W. Ladd  
Thomas W. Ladd

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<sup>2</sup> The Retention Order is attached hereto as Exhibit A.

<sup>3</sup> The summary set forth below is qualified in its entirety by reference to the time and services detail in the invoices attached hereto as Exhibit B.